

JAMES CHARLES HILL; July 10, 2019

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON,)
)
PLAINTIFF,)
vs.) CASE NO. 3:17-CV-
) 05806-RJB
THE GEO GROUP, INC.,)
)
DEFENDANTS.)
_____)

DEPOSITION OF JAMES CHARLES HILL,
30(b)(6) WITNESS FOR THE GEO GROUP, INC.
WEDNESDAY, JULY 10, 2019

REPORTER:
JESSICA N. NAVARRO,
C.S.R. NO. 13512
JOB NO: 3441242
PAGES 1 - 256



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1 DEPOSITION OF JAMES CHARLES HILL, TAKEN ON BEHALF OF
2 PLAINTIFF AT 10:00 A.M., ON WEDNESDAY, JULY 10, 2019, AT
3 400 SOUTH HOPE STREET, 8TH FLOOR, LOS ANGELES,
4 CALIFORNIA, BEFORE JESSICA N. NAVARRO, C.S.R. NO. 13512,
5 PURSUANT TO NOTICE.

6
7 APPEARANCES OF COUNSEL

8
9 FOR PLAINTIFF:

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ASSISTANT ATTORNEY GENERAL

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I N D E X

WITNESS	EXAMINATION	PAGE
JAMES CHARLES HILLS	BY MS. BRENNEKE	5

E X H I B I T S

NO.	PAGE	DESCRIPTION
EX. 251	31	NOTICE OF CONTINUING DEPOSITION PURSUANT TO RULE 30(b)(6) AND DEMAND FOR DESIGNATION OF REPRESENTATIVES DEPONENT
EX. 252	68	CONSOLIDATED FINANCIAL STATEMENT FOR 2005 THROUGH 2018 FOR NORTHWEST DETENTION CENTER
EX. 253	80	CONSOLIDATED FINANCIAL STATEMENT FOR 2005 THROUGH 2018 FOR NORTHWEST DETENTION CENTER WITH HANDWRITTEN CALCULATIONS
EX. 254	138	2015 ICE FISCAL YEAR CONTRACT BILLING ACCUMULATION PER CLIN
EX. 255	169	NORTHWEST DETENTION CENTER TACOMA, WASHINGTON REVISED PRICING
EX. 256	175	LETTER FROM AMBER MARTIN, VICE PRESIDENT OF CONTRACTS FOR GEO, DATED NOVEMBER 19, 2009 TO BOBBY WRIGHT OF U.S. DEPARTMENT OF HOMELAND SECURITY
EX. 257	177	EMAIL CHAIN WITH ATTACHMENTS



1 EXHIBITS (CONTINUED) :

2 NO. PAGE DESCRIPTION

3 EX. 258 188 EMAIL FROM ERIC SMITH TO GEORGE

4 WIGEN WITH ATTACHMENTS

5 EX. 259 211 EMAIL CHAIN

6 EX. 260 233 EMAIL FROM RYAN KIMBLE TO CHUCK HILL

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8

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10 QUESTIONS INSTRUCTED NOT TO BE ANSWERED

11 (NONE)

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LOS ANGELES, CALIFORNIA

WEDNESDAY, JULY 10, 2019, 10:00 A.M.

- 0 -

JAMES CHARLES HILLS,

having been duly administered an oath by the
reporter, was examined and testified as follows:

EXAMINATION

BY MS. BRENNEKE:

Q Will you please state your name?

A James Charles Hill.

Q And what is your work address?

A 6100 Center Drive, Suite 825, Los Angeles,
California 90045.

Q Will you please state your employer and
your title?

A The GEO Group and I'm the Director of
Business Management of the Western Region.

Q You've been designated by the GEO Group as
the 30(b)(6) or corporate representative for this
deposition today; is that true?

A Yes.

Q So I'm Andrea Brenneke and this is La Rond
Baker and we're here representing the State of



1 THE WITNESS: I only recall several
2 occasions where they -- where GEO had received prior
3 approval from ICE to pay in excess of a dollar a
4 day. And --

5 MS. ARMSTRONG: Please let him finish his
6 answer.

7 MS. BRENNEKE: I'm sorry.

8 MS. ARMSTRONG: He wasn't done.

9 THE WITNESS: And I don't know what the
10 billing mechanism for those days were.

11 BY MS. BRENNEKE:

12 Q Okay. So, you don't -- so, you're aware
13 of instances in which GEO paid detainees more than a
14 dollar a day for the work in the voluntary work
15 program; is that right?

16 MS. ARMSTRONG: Object to the form;
17 outside the scope.

18 THE WITNESS: I'm aware of three specific
19 instances at Northwest where detainees were paid
20 above a dollar a day for a limited time period with
21 ICE's expressed approval.

22 BY MS. BRENNEKE:

23 Q I'm sorry with what? With ICE's --

24 A Approval.

25 Q Approval. Okay. What were those



1 instances?

2 MS. ARMSTRONG: Object to the form;

3 outside the scope.

4 THE WITNESS: There was a period where

5 barbers who worked irregular shifts were approved to

6 work an additional shift, which could have coincided

7 with the day they worked as a barber in a different

8 work detail.

9 There was an occasion where female

10 detainees who are working a detail, I believe in

11 their housing unit folding clothes, were also

12 authorized to work an additional detail outside

13 their housing unit for a short time.

14 And then the third was an occasion where

15 cleared workers in the kitchen received five dollars

16 per day -- per detail for a predetermined period. I

17 don't know what that period was. I believe it was

18 nine days -- five days -- nine days.

19 BY MS. BRENNEKE:

20 Q Are you aware of any other instances in

21 which GEO paid detainees more than a dollar a day

22 for their work?

23 MS. ARMSTRONG: Object to the form;

24 outside the scope.

25 THE WITNESS: Am I aware -- in the Western



1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES) ss.

3
4 I, JESSICA N. NAVARRO, C.S.R. NO. 13512, in
5 and for the State of California, do hereby certify:

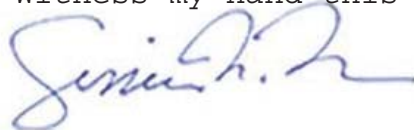
6 That prior to being examined, the witness
7 named in the foregoing deposition was by me duly sworn
8 to testify to the truth, the whole truth, and nothing
9 but the truth;

10 That said deposition was taken down by me in
11 the shorthand at the time and place therein named and
12 thereafter reduced to typewriting under my direction,
13 and the same is a true, correct, and complete transcript
14 of said proceedings;

15 That if the foregoing pertains to the original
16 transcript of a deposition in a Federal Case, before
17 completion of the proceedings, review of the transcript
18 [] was [] was not required.

19 I further certify I am not interested in the
20 event of the action.

21 Witness my hand this 16th day of July, 2019.

22 
23

24 <%18541,Signature%>

25 JESSICA N. NAVARRO, C.S.R. NO. 13512

